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November 10, 2003

To: U.S. Department of State
CA/OCS/PRI
Adoption Regulations Docket Room
SA 29
2201 C Street, NW
Washington D.C. 20520
electronically emailed to: adoptionregs@state.gov

Re: Request to recognize COA accredited agency compliance with identified
duplicate standards of the Hague Accreditation standards.

New Hope Child and Family Agency, Seattle, WA, recommends "recognition of compliance" with identified duplicative standards for those agencies currently accredited by COA for intercountry adoption services.

New Hope Child and Family Agency understands the importance of the new Hague Accreditation standards and process to ensure compliance with the Intercountry Adoption Act. Currently New Hope Child and Family Agency is accredited by the Council on Accreditation for Intercountry Adoption Services. Having already demonstrated compliance with a number of sufficiently similar standards, we encourage the State Department to allow currently COA accredited organizations to receive credit for compliance with this select group of duplicative standards.

"Recognition" provides no unfair benefit to currently accredited agencies, as we will not achieve full accreditation without undergoing the Hague Accreditation and responding to a significant number of additional standards. In sum, all intercountry adoption providers will be held to the exact same requirements regardless of their current voluntary accreditation status, however the documentation and review of duplicative standards (highlighted in this response and the attached crosswalk) would be unnecessary.

Attached is the chart prepared by COA identifying the sufficiently similar standards that warrant recognition. A copy of the complete crosswalk comparison of the regulations and COA standards was provided in COA's comments to the draft regulations, or could be obtained by contacting COA. Your consideration of this "recognition" is greatly appreciated. It is apparent that all organizations, government oversight bodies and accreditors are pursuing quality standards and in these times of important movement towards accountability it is also important to achieve these outcomes without duplication of effort.

Thank you for your consideration.

Respectfully submitted,

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Executive Director

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Director of International Services



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Proposed Standards for Recognition for Hague Accreditation

Sufficiently Similar	
Proposed Rules	COA Standards
96.30 a)	S15.2
96.30 b)	G11.3.01
96.30 c)	S15.2.03
96.32 b)	G3.1.01, G3.6, and G3.7.01 (a, d)
96.32 c)	G3.5.07
96.33 a)	G6.2.02 and G6.2.04
96.34 c)	S15.3.03
96.34 d)	G4.2.02
96.35 d) 1)	G4.7.04
96.37 a)	S15.6
96.37 b)	S15.6.04
96.37 c)	S15.6.07
96.37 d) 1)	S15.6.01 (a)
96.37 d) 2)	S15.6.01 (b)
96.37 e) 2)	S15.6.02
96.38 a) 6)	S15.6.03 (a)
96.38 a) 7)	S15.6.05 (b)
96.38 b) 1)	S15.6.03 (a)
96.38 b) 2)	S15.6.03 (b, d)
96.38 b) 7)	S15.6.03 (b)
96.39 c)	S15.3.06
96.40 a)	S15.3.01
96.40 b) 3)	S15.3.02 (c)
96.40 b) 7)	S15.3.01
96.41 d)	G1.8 (d)
96.41 h)	G2 and G2.1.01
96.42 d)	S15.5.01 (a, c)
96.42 e)	G11.4.07 (a)
96.45 a) 1)	G11.8.05 (a)
96.45 b) 5)	G11.7.04 (i)
96.45 b) 13)	G11.7.04 (l)
96.47 a) 2)	S15.4.02 (c)
96.47 c) 2)	S15.2.03
96.48 b) 7)	S15.4.07
96.48 c) 1)	S15.4.07
96.48 c) 3)	S15.4.03 (c)
96.50 c)	S15.5.02 (b)
96.50 g)	S15.5.02 (a)

This chart was developed by the Council on Accreditation. Any questions should be directed to: Jayne Pietrass, Council on Accreditation; jpietrass@coanet.org or 866-COA-8088.